

APRIL 25, 2021

JAMES J DULACY JR.

Plaintiff

v

Allegheny County Jail, Orlando Harper
Warden, Laura Williams Dep. Warden of
Medical, Allegheny County Jail Medical -
Allegheny Health Network

Defendants

Amended Complaint

No. 2:21-cv-00174

MAGISTRATE JUDGE

LISA PULP LENOIR FILED

MAY 03 2021

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

In The United States District Court For The
Western District of Pennsylvania

Amended Complaint

① My complaint is that I am not getting medical treatment properly. This all started November - December 2019 with my EAR PROBLEMS, I told medical that I HAVE OTIS MEDICAL (Ruptured EAR DRUMS) with get infected behind the drum. Due to water getting behind and inside the EAR DRUM causing infection I WAS TREATED WITH ANTI-BIOTICS THAT WOULD NOT WORK FOR THE INTERNAL INFECTION. The PAIN AND PUSHEON WAS UNBEARABLE AT TIMES until the drum would CRACK AND POP AND DRAIN. This went on for months. Finally Jun 29, 2020. I went TO AN OUTSIDE DOCTOR DID SOME TESTS AND CLEARED THE INSIDE OF MY DRUM AND RECOMMENDED ME TO A NOTHER DOCTOR. AT THIS TIME I WAS ON MORE ANTIBIOTICS WHICH DID NOT HELP. I FINALLY GOT TO SEE THE SECOND DOCTOR JANUARY 19, 2021. THE FIRST DOCTOR RECOMMENDED ME TO SEE THE NEW DOCTOR A.S.A.P.. 7 months LATER I GOT TO SEE HIM AND HE RECOMMENDED A CT SCAN ON MY HEAD TO SEE THE BONE LOSS IN MY NASA CAVITY AND TO RETURN IN 2-3 WEEKS. I HAD A FOLLOW UP WITH HIM ON FEBRUARY 22, 2021 BUT THERE WAS NO CT SCAN SO HE ORDERED ANOTHER CT SCAN AND FOLLOW UP IN 2-3 WEEKS. ON APRIL 19, 2021 I FINALLY GOT THAT CT SCAN AND NOW WAITING FOR THE FOLLOW UP APPOINTMENT.

DURING ALL THIS ALL MY NOTES AND MEDICAL PAPERS WERE LEFT IN MY PROPERTY AT BUTTER JAIL SO I HAVE NO SUMMARY REPORTS TO SHOW BECAUSE MEDICAL SAID THEY ALREADY GAVE ME COPIES. AND I KEEP GETTING POINTED IN DIFFERENT DIRECTION AT EVERY TRY.

(2) Blood was taken in May 2020 to look in to my infection with my ears and to see what ears might be going on with my constant aches and pains and no one contacted me until I see the nurse the first week of June and she informed me in the hall by the elevator on level 4 that I have lymes disease and high blood pressure she told me to take meds that she was going to prescribe that I would be just fine. I asked about this and was told nothing. I confronted Laura Williams in December of 2020 about the lymes and December 25 2020 she told me that I don't have lymes. I have had a nurse give pamphlets on lymes, why would they do that if I don't have it.

Again all my summary reports from medical were left in my property at Butler Allegheny County Sheriff's would not let me bring my paper work.

(3) A small wound on my left leg would not heal after the leg shackle cut open the inner side ankle November 2019 now it has some kind of bacteria eating my skin away the bacitracin ointment they keep putting on it makes it worse and they keep prescribing it. All this has been going on for over 16 months.

I was just told April 21, 2021 that they were short staffed and they would get me my summary reports as soon as they could I do have a picture of my leg on the outside a lawyer took through video conference

The relief I am seeking is for pain and suffering, hearing loss, all medical bills paid and 2.5 million dollars for the hearing I will never get back and my equilibrium (balance) that plagues me cause of the ears.

Respectfully 4-25-2021

James J. Dulay Jr.
JAMES J DULAY JR 102739
Allegheny County Jail
950 Second Ave
Pitts PA 15219